UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-60013-CR-MORENO

UNITED STATES OF AMERICA

EUNIDE SANON,

v.

Defendant.

FACTUAL BASIS IN SUPPORT OF PLEA

The United States hereby files this factual basis in support of the change of plea of defendant **EUNIDE SANON**. In support thereof, the government asserts the following facts:

Siena Education Center LLC (Siena Education) was a Florida limited liability company with a listed address of 7491 W Oakland Park Blvd, Suite 100, Lauderhill, Florida.

Siena College of Health II LLC (Siena College) was a Florida limited liability company with a listed address of 7491 W Oakland Park Blvd, Suite 100, Lauderhill, Florida. According to Siena's website, Siena was licensed by the Florida Commission for Independent Education and the Florida Board of Nursing, and it offered a Practical Nursing Program and an RN Program.

PowerfulU Healthcare Services LLC (PowerfulU) was a Florida limited liability company with a listed address of 3601 W. Commercial Blvd., Suites 14 and 15, Fort Lauderdale, Florida. On its public Facebook page, PowerfulU advertised itself as a "group of nurses and doctors wanting to empower men and women by helping them to become health care providers."

Docu-Flex & More LLC (Docu-Flex) was a Florida limited liability company with a listed address of 3601 W. Commercial Blvd., Suites 14 and 15, Fort Lauderdale, Florida.

CEUfast, Inc., a company based in Lake City, Florida, was accredited as a provider of continuing nursing education by the American Nurses Credentialing Center's Commission on Accreditation. CEUfast, Inc.'s services were accessible via the internet at ceufast.com.

The New York State Education Department (NYSED) was the department of the New York state government responsible for all applications and licensure of medical professionals, including RNs and LPNs.

Defendant Eunide Sanon, a resident of Broward County, was the Owner, Registered Agent, and Manager of Siena Education and Siena College (collectively Siena).

Geralda Adrien, a resident of Broward County, was the President of PowerfulU and Manager of Docu-Flex.

Woosvelt Predestin, a resident of Broward County, was an employee of PowerfulU and Docu-Flex.

From on or about November 17, 2018, through in or around October 2021, in Broward and Palm Beach Counties, in the Southern District of Florida, and elsewhere, Eunide Sanon, Geralda Adrien, Woosvelt Predestin, and others sold false and fraudulent diplomas and educational transcripts to co-conspirators which falsely represented that the co-conspirators had completed the necessary courses and/or clinical training to obtain nursing degrees from Siena when in fact the co-conspirators had never completed the necessary courses and/or clinical training.

Geralda Adrien, Woosvelt Predestin, and others completed required online continuing education courses from CEUfast, Inc. on behalf of the co-conspirators and transmitted the ensuing certificates of completion to state accreditation agencies by means of wire communication in interstate and foreign commerce.

Eunide Sanon, Geralda Adrien, Woosvelt Predestin, and others mailed and caused others

to mail, by United States Postal Service, fake diplomas, transcripts, and other false and fraudulent documents to co-conspirators and to state licensing agencies, including the NYSED, on behalf of the co-conspirators.

In furtherance of the conspiracy, co-conspirators made electronic payments, by means of interstate wire communication, to Eunide Sanon, Geralda Adrien, Woosvelt Predestin and others for providing the false and fraudulent diplomas and other licensing documents.

Using the false and fraudulent continuing education certifications, diplomas, transcripts, and other fraudulent documents, Eunide Sanon, Geralda Adrien, Woosvelt Predestin, and others assisted co-conspirators to obtain fraudulent nursing licenses from state licensing agencies, and ultimately employment in the healthcare field.

Co-conspirators used the false and fraudulent diplomas, transcripts and other documents created and distributed by Eunide Sanon and others, to fraudulently obtain employment and benefits at various unwitting health care providers throughout the country.

Eunide Sanon, Geralda Adrien, Woosvelt Predestin, and others used the proceeds of the fraud for their personal use and benefit, and to further the fraud.

The above-described facts serve only as a summary of the testimony were this case to proceed to trial and are not intended to be an exhaustive account of all the information available to the Government concerning the offenses charged in the instant case.

By:

Date: 3/14/23

By:

CHRISTOPHER J. CLARK ASSISTANT U.S. ATTORNEY

MARK LOWRY ESO

ATTORNEY FOR DEFENDANT

Date: <u>カルト 2033</u>

By: ()

DEFENDANT